

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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2022 MAR 28 2:39

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
SUPPLEMENTAL DEPOSITION DESIGNATIONS FOR TRIAL**

COMES NOW the Defendant and Counterclaim Plaintiff, Amber Laura Heard, by counsel, and pursuant to the Court's ruling from the bench at the February 9, 2022 Pretrial Hearing and the Scheduling Order issued in this case on April 22, 2021, hereby supplements her designations of deposition testimony for trial as follows. All designations are subject to rulings on Motions *in Limine* and other rulings of the Court, and Defendant/Counterclaim Plaintiff reserves the right to modify or withdraw any designations based on rulings of the Court and/or other developments prior to or at trial.

Deposition of Christian Carino, Volume 2 (March 11, 2022)

Page Lines

213	16 (from "So") - 18
215	3-7 and 10
217	10 [Replace "Exhibit 16" with Def Ex 1024] 15 (from "you'll") - 19
218	12-14 15 (from "And") - 18
219	6 (from "And") - 11 and 18-19
220	7-13 and 16 18 (from "I") - 22
221	1, 4 and 6-8
228	7 [Replace "Exhibit 17" with Def Ex 1022]

	10 (from "You'll") – 13 (through "her")
229	7 and 17-22
230	1-4 and 19-22
231	1 and 20-22
232	1-7
235	18-22
236	1-2
266	16-17 and 20
350	5-11

Deposition of Debra Lloyd, APRN (March 8, 2022)

Page Lines

11	12-20
17	16-19
21	4-9 and 20-22
22	1-22
23	1-6
24	2-13 and 18-22
25	1-22
26	1-13
29	29 (from "How") – 2 20 (from "Did") – 22
30	1
32	1-5 and 9
34	9-17
35	5 (from "Was") – 10 22
36	1 and 16-22
37	1-5 and 10-11
39	10-17 [Replace "Exhibit 1" with Def Ex 1069]
40	12-22
41	1-8 15 (from "let's") – 22
42	1-19
43	15-22
44	1-18 and 21-22
45	1-4 and 6
46	5-16 and 19
47	7-17 and 20
48	9-20
49	2-5 and 12-22
50	1-5, 7, and 16-19
52	11-13 [Replace "Lloyd Exhibit 2" with Def Ex 263]

54	1 (from "do") – 8 10 (from "the gray") -19 21-22
55	1-8 and 15-22
56	1 9-15 [Replace "Lloyd Exhibit 2" with Def Ex 263]
57	3-8, 12-16 and 22
58	1-3
59	3-7 [Replace "Lloyd Exhibit 2" with Def Ex 269] 12 (from "Do") – 13 18-19
61	3-6 and 10-17
62	1-3, 12-19 [Replace "Lloyd 4" with Def Ex 269] 22 (from "And")
63	1-2, 5-15 and 17
64	4 (from "So") - 6 [Replace "Lloyd Exhibit 1" with Def Ex 1069] 8 (from "And") - 17
65	19-21
67	1-4 and 16-22
68	6-9 18 (from "Lloyd Exhibit 5")- 22 [Replace "Lloyd Exhibit 5 with Def Ex 283]
69	1-15 and 19-22
70	1-7 19 (from "Do") – 21
71	1-2 [Replace "Exhibit 1" with Def Ex 1069] 12-22
72	1-2
74	11-22
75	1-4 and 13-19
76	11 (from "And") – 22
77	1-22
78	7-17 and 22 (from "And")
79	1-2, 4-7 and 21-22
80	1-3 and 6-22
81	1-2
82	21 (from "Ms.") – 22 [Replace "Exhibit 6" with Def Ex 300]
83	1-4 and 7-22
87	10-11 [Replace "Exhibit 8" with Def Ex 307] and 22 (from "Mr.")
88	1-11
89	22
90	1-2 [Referring to Exhibit 9 = Def Ex 304]
93	19-22
94	1-8 and 18-22
95	4 and 11 [Replace "Exhibit 10" with Def Ex 319]
96	3-14

97	12-17
98	17 (from "Exhibit") – 22 [Replace "Exhibit 11 with Def Ex 328]
99	1-16
100	6 (from "And") – 11 13-17
101	4-5 and 10-14
102	19-22 [Replace "Exhibit 12" with Def Ex 335]
103	1-13, 16-18 and 22
104	1-22
105	1-22
106	1-22
107	1-15 16 (from "And") – 22
108	1-13 and 17-18 20 (from "So") -21
109	1-2 and 11-22
110	1-22
111	1-3
113	1-3
114	11-12 and 15-22
117	2-22 [Replace "Exhibit 13" with Def Ex 336]
118	1-22
119	1-7 and 9-12
120	4-5 and 8-22
121	1-2 and 22
122	1-3 and 7-21
123	1-6
124	2-4 and 8-20
125	1-2 and 17-22 [Replace "Lloyd 14" with Def Ex 351]
126	1-12 and 22 (from "as")
127	1-14 and 20-22
128	1-3 and 5-16
129	10 (from "do") – 22
130	1-15 and 20-22
131	1-6 and 10-16
132	12-21
134	1-2 and 4-9
136	8-10
137	11-19
138	14 (from "Do") – 16 and 21
139	8-21 [Replace "Exhibit 15" (2 pgs) with Def Exs 614+391]
140	7 (from "Do") – 15, and 20-21
141	10-22
142	1-22
143	1-7 and 14-15

144	8 (from "If") – 22
145	1
147	6 (from "Ms.") – 9 16 (from "Exhibit") – 17 (through "145") [Replace "Exhibit 16" with Def Ex 395]] 20-22
148	1-22
149	1-22
150	1-12
151	2-22
152	1-16
153	12 (from "And") – 21
155	2-22 [Replace "Lloyd 17" with Def Ex 405]
156	1-5, 9 and 19-22 [Replace "Lloyd Exhibit 18" with Def Ex 407]
157	1 19 (from "So") – 22
158	1-22
159	1-7 and 9-14
160	1-7
161	1 (from "And") – 22
162	1 (from "Do") – 3 and 12-22
163	1 and 5-22 [Replace "Exhibit 1" with Def Ex 1069]
164	1-6, 8-10 and 14-20
165	2, 4-6 and 12-22
166	1 and 4-22
167	2-3 and 5-14
168	1 (from "Do") – 2 6-15
169	1-21 [Replace "Lloyd 19" with Def Ex 443]
170	4-6 and 8-14
171	1-14 [Replace "Exhibit 20" with Def Ex 455] 17-22
172	1-18
173	5 (from "And") -10 12 (from "And") – 22 [Replace "Exhibit 1" with Def Ex 1069]
174	1-22
175	1-6
176	4 (from "And") – 7 21 (from "Ms.") – 22 [Replace "Exhibit 21" with Def Ex 414]
177	1-19
178	5-8 and 11-22
179	1-14 and 17
191	9 [Replace "Exhibit 24" with Def Ex 247] 11-22
192	1-8 and 15-22
193	10-20 [Referring to Exhibit 23; Replace with Def Ex 1076]

194	11-21
195	4-5, 7-12 and 15
200	22
201	1-4
203	7-8 [Replace "Exhibit 23" with Def Ex 1076] 21-22
204	1-19
205	1-5 and 10-13
208	5 ("So") – 17
209	5-20
212	17-20
213	1-3 and 10-22
214	1-22
215	1-5, 8-12, 16-17 and 21-22
216	1
222	22 (from "Do")
223	1-2
234	13-22
235	1-17
239	14-22
240	1-7
242	13-22
246	17-18 [Replace "Exhibit 14" with Def Ex 351] 22 (from "I'd")
247	1-10
251	5 (from "Do") – 9 12-14
252	13-14 (through "23") [Replace "Exhibit 23" with Def Ex 1076]
253	2-5 9 (from "Directing") – 17
254	11-22
255	1-18 and 22
256	1-2 7 (from "Do") – 13 15-18
261	9-14
262	10-22 [Referring to Exhibit 27; Replace with Def Ex 402]
263	1-18 and 22
264	1-13 and 18-22
265	1-22
266	1-22
267	4-18 (through "23") [Replace "Exhibit 23" with Def Ex 1076]
273	19-22
274	5-6 and 10-16
279	21-22

280	1-8 and 10-14
282	10-19
283	10 (from "How") – 11 13-14
290	7-11
291	11-16 and 20-22
292	1-13 [Referring to Lloyd Exhibit 22; Replace with Def Ex 246] 14 (through "to") 21 (from "Lloyd") [Replace "Lloyd 23 with Def Ex 1076]
293	2-22
294	1-22
295	1-19
297	6 (from "And") - 16

Deposition of Debbie (Depp) Rassel (March 10, 2022)

Page Lines

6	13
9	19 (from "what") – 22 (through "Drive")
10	3
11	1-3
13	10-16 17 (from "does") – 18 20 (through "Yes")
17	12-14 [Replace "Exhibit 2" with Def Ex 877] 20-21
18	8-16
20	11-20
21	2-5, 11-12 and 20-22
22	1 and 3-6 (through "argued" 22
23	1-2 and 13-17
24	8-12
26	10 (from "And") – 13 16-19
27	15 (from "what led") – 22
28	1-2, 5-7 and 15-22
29	1-4 and 11-12
31	3-16
33	11 (from "so after") – 21 (through "letter")
34	19 (from "since") -21
35	2 (from "no") – 6 7 (from "the event") – 10 15 (from "So") – 20

	21 (from "what are") – 22
36	1-2
38	9-10 [Replace "Exhibit 3" with Def Ex 1023]
39	6-8 [Replace "Exhibit 3" with Def Ex 1023] 9 (from "I'm") – 10 11 (from "on") – 17 19-21
42	18-19
43	2-5 (through "time") 21-22 (through "home")
44	3 (from "it's") – 4 12 (from "you") – 15 17 (from "what") – 19 21 (from "I") -22
45	1 (through "there")
46	7-9 and 13
51	19-20
52	1 2 (from "you") – 5 (through "Yes") 8-11 14 (from "So") – 21 22 (from "I")
53	1-5
54	3-5 12 (from "I") – 13
55	3 (from second "did") – 7 11
56	6-17
57	13 (from "he") – 16 (through "Yes") 17-20
58	21-22
59	1 and 21-22
60	3-7 and 9 18 (from "it") – 22
61	2 10 (from "I") – 12 (through "know") 14-17 and 20-22
62	1-5 and 8-17
63	4 (from "who") – 5 8 21 (through "guards") 22 (from "I felt")
64	1 and 6-10
65	3-7
66	20-22

67	7 (from "you recall") – 10 [Replace "Exhibit 2" with Def Ex 877]
68	1-8 (through "him") 9-10 (through "4") [Replace "Exhibit 4" with Def Ex 156]
69	6 (from "Does") – 8 11 (from "If") 12 (through "so")
70	12 (from "are you telling") -14 19-21
75	2 (through "pages") [Replace "Exhibit 6" with Def Ex 21] 18 (from "Are") – 21 (through "Yes")
84	10-13

Deposition of iO Tillett Wright (March 10, 2022)

Page Lines

9	6 (through "morning")
14	10 (from "And") – 13
18	18 (from "have") – 22
19	7-9
36	14 (from "If") – 17
37	8-10
44	12 (from "Mr.") – 21
45	4 (From "What") – 8
46	7 (from "In") – 9 13-14 and 21-22
47	1-14
49	1 (from "Before") [Replace "Exhibit 1" with Def Ex 977] 9-13 and 16-21
50	5-17
56	15 (from "Now") – 20
57	10-11, 13-16 and 19-21
58	3-7
65	21 (from "Putting") – 22
67	1-2
70	16 (from "And") – 18
71	9 (from "I") – 17
77	5-7, 9-15 and 18-22
78	1-17
79	6-13
80	7 (from "So") – 8 11-14 and 20-22
81	1-7 8 (from "I'm") – 15
82	1-22

83	1-22
84	1-20 and 22
85	14 (from "And") – 18
87	13-20
89	18-22
90	1-6 and 15-22
91	1 and 5-21
95	1
96	1-3, 6-9 and 19-22
97	1-4 and 6-21
98	1-8 and 10-16
99	1-22
100	1 and 8-9
101	19-22
102	1-9, 11-14 and 17-22
103	1-11 16 (from "And") – 17 19 and 21-22
104	3-6, 8, 11-15 and 19-22
105	1, 5, 8-9 and 13-17
106	8-9 and 22
107	1-2 and 10-21
108	3-7 and 12-16
109	1-6, 8-9 and 12-16
110	15-21
111	5-6, 12-15 and 17-22
112	1-4 and 11-21
113	11-22
114	1-22
115	1-22
116	1-20
117	20-22
118	4-9
123	12 (from "my") – 13
124	11 and 18-22
125	1-2 and 15-17
129	6-8 10 (from "Let's) - 11 [Replace "Depp Exhibit 1" with Def Ex 977] 13-22
130	1-10 and 18-22
131	1-22
132	1-22
133	1-22
134	1-22
135	1-15

136	5-16
137	18-19 and 21-22
138	1-13
139	7-9, 11-17 and 21-22
140	1-21
141	1-22
142	1-22
143	1-11, 17-18 and 22
144	1-22
145	1-22
146	1-22
147	1-22
148	1-18 and 22
149	1-2 and 6-20
150	12-22
151	3-13 and 17-22
152	1-7 and 12-22
153	1-22
154	1-2 5 (from "And") – 7 16-22
155	1-8, 10, 13-17 and 19-22
156	6-13 and 16-22
157	1-22
158	1-7
159	1-2, 8-17 and 20-22
160	1-22
161	1-3 6 (from "And") – 9 12-22
162	1-22
163	1-18
164	4-6 and 9-22
165	1-22
166	1
167	4 (from "What") – 7 11-22
168	1-18 and 21-22
169	3-6 and 10-22
170	1-22
171	1-8, 12-15 and 19-22
172	1-4 and 11-22
173	1-2, 7-9 and 12-22
174	1 and 21-22
175	1, 3-6 and 11-22

176	17 (from "What") – 19
177	6-22
178	1-6 14 (from "What") – 16 19-22
179	1-22
180	1-11 and 14-22
181	1-22
182	1-6 and 21-22
183	1-7 and 11-22
184	1-22
185	1-22
186	1-22
187	1-22
188	1-20
189	10-11 and 14-22
190	1-22
191	6-9 and 12-22
192	1-22
193	1-22
194	1-22
195	1-22
196	1 4 (from "What") – 9 12-22
197	1-2, 5-19 and 22
198	1-22
199	1 and 4-22
200	1-22
201	1-22
202	1-22
203	1-22
204	1-22
205	1022
206	1-3 22 (from "I'm")
207	1-3 [Replace "Exhibit 3" with Def Ex 1530] 16-22
208	1-2, 5-9, 13-15 and 17-21
209	19-22
210	1-22
211	1-22
212	1-22
213	1-22
214	1-22

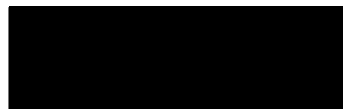
215	1-22
216	1-17 and 21-22
217	1-22
218	1-17
219	7-11 [Replace "Exhibit No. 5" with Def Ex 537] 18-22
220	1-4 and 16-22
221	1-2 5 (from "is") – 7 and 10
222	8-11 [Replace "Exhibit No. 6" with Def Ex 1493M] 20 (from "Please") – 21
223	2-9, 13-19 and 22
224	1-4 12-13 [Replace "Exhibit No. 7" with Def Ex 1493O] 17-19
225	1-6, 10 and 19-22
226	1, 4, 8-14 and 22
227	1-2 [Replace "Exhibit No. 9" with Def Ex 1493X] 5-6 and 8-21
228	1-2 and 21-22
229	1-5, 10-12 and 15-21
230	2-22
231	1-22
232	1-22
233	1-22
234	1-7
235	10-22 [Replace "Exhibit No. 13 with Def Ex 560]
236	1-13 and 16-18
237	6-10 [Replace "Exhibit No. 14" with Def Ex 575] 13-22
238	1-12 and 15
239	2-5 [Replace "Exhibit No. 15" with Def Ex 579] 8-14 and 20-22
240	1-22
241	1-11 and 19-22
242	1-22
243	1-22
244	1-2
245	17-20 [Replace "Exhibit No. 16" with Def Ex 616]
246	1-3 and 5-22
247	1-21
248	9-12 [Replace "Exhibit No. 17" with Def Ex 638] 14-21
249	5-11 and 14-22
250	1-22

252	9 (from "I'm") – 22
253	1-16 and 20-21
254	1 (from "I'm") – 4 7-22
255	1-22
256	1-22
257	1-22
258	1-22
259	1-22
260	1-22
261	1-22
262	1-22
263	1-22
264	1-22
265	1-22
266	1-22
267	1-18 and 22
268	1-4
269	1-9, 13-16 and 19-22
270	1-22
271	1-8 and 16-22 [Replace "Exhibit No. 21" with Def Ex 762]
272	1-12 and 21-22
273	1-18 [Replace "Exhibit No. 22" with Def Ex 832]
274	1-22
275	1-21
276	3-13 and 17-21
277	15-18
278	1-22
279	1-22
280	1-22
281	1-5 and 15
282	1-10 and 15-22
283	1-11 and 16-22
284	1-18 and 22
285	1-12 and 15-22
286	1-6, 9-13 and 17-18
287	1-6
288	13-17 and 21-22
289	1-7, 10-18 and 22
290	1-5, 9-15 and 21-22
291	3-5 and 8-9
299	20 (from "And") – 22
300	1-3 and 6-18
301	7-13
315	16-19

316	1-6 and 10-22
317	13 (from "Did") – 15, and 22
318	1-6 (through "taken") 8-9
321	6-20
337	2 (from "And") – 4 10 and 15-22
338	1-15, 17-18 and 22
339	1-10

March 15, 2022

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 15th day of March, 2022, by email, by agreement of the parties, addressed as follows:

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